

Exhibit 50

SCHOOL DISTRICT/LOCAL GOVERNMENT ENTITY PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO EXCLUDE TESTIMONY OF SCHOOL DISTRICT EXPERTS

Case No.: 4:22-md-03047-YGR

MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

Affidavit of Jeremy Hall

1. My name is Jeremy Hall and I make this declaration based on my personal knowledge.
2. I received a Bachelor of Arts in Teaching Social Studies in December of 2020 from Morehead State University and received a Master of Arts in School Administration in December of 2009 from Morehead State University.
3. I have 23 years of experience working in Pre-K-12 education.
4. I have been the principal at Sebastian Elementary School since August of 2019.
5. Prior to this, I held the positions of principal from 2015 to 2018 in the Martin County School District and the position of principal from 2018 to 2019 at LBJ Elementary in the Breathitt County School District.
6. Sebastian Elementary School consists of children in grades 3 – 6.
7. In my position as principal, I oversee the staff at Sebastian Elementary School, disciplinary measures related to student use of social media, and implementation of various methods of attempting to prevent and/or limit students' use of social media during instructional hours.
8. For the 2024 - 2025 school year, we developed a new cell phone policy to attempt to decrease student use of social media during instructional hours. My staff and I spent approximately 19 combined hours considering, developing, and finalizing this policy.
9. Sebastian Elementary School uses a database to track disciplinary infractions. However, infractions that are handled in the classroom are not entered into this database. The majority of the time, infractions involving social media use during instructional time are handled in this manner and thus are not reflected in our database.

10. Currently, addressing the effects of social media on our students, including on their attention span, is one of the biggest challenges that we address as principals, assistant principals, and administrators at Sebastian Elementary School for our 5th and 6th grade students. Nearly every 5th and 6th grade student who walks into our school is dealing with an issue related to social media. Accordingly, a substantial amount of my work time and the work time of my assistant principal is spent addressing the fallout of social media's negative impact on students.

11. In my experience, I have seen a growing problem of compulsive and problematic use of social media among our 5th and 6th grade students. We face a constant battle in separating students from their phones as students use methods to circumvent our attempts to limit their exposure to social media during instructional time.

12. The time that I have to spend on social media related impacts on students has substantially increased in the nearly 6 years that I have worked as principal at Sebastian Elementary School.

13. When I first started as a principal in August of 2018, I spent approximately 10% of my time on social media related concerns.. By 2020, that number had risen to around 15%. Now in 2025, I spend anywhere from 20 - 25% of my work time addressing social media issues.

14. Because of the amount of time that I now spend addressing social media impacts on students, I have less time to dedicate to other aspects of my job such. For example, I am the instructional leader of my school. I should spend the great majority of my time in classrooms addressing the teaching and learning going on daily. Time for coaching is more limited because we cannot use teaching planning periods for these sessions. I also need to be able to plan for committee meetings, PLC meetings, and other required district meetings. Time that would normally be spent on planning now occurs after working hours are completed. There are times

when communication is more limited than normal due to the time spent working on social media issues. Due to these time constraints, there are many contacts that need to be made concerning students that we have with academic, social/emotional, and family issues that are either put off for far too long or may not be made before the issue is resolved. All three of our administrators are now trained to conduct threat assessments due to the increased number that we have at our school. There have been times when I have had instructional resource meetings postponed due to lack of time. I have also had to reschedule ARC (admission release committee) meetings, PLC (planned learning community) meetings, and staff conferences due to lack of time.

15. Moreover, while having additional teaching aides would be helpful in addressing the negative impacts that the rising use of social media has had on students, the Breathitt School District has not been able to increase teaching aid hiring commiserate with the needs of the student population that has been negatively impacted by social media due to funding constraints.

16. I regularly interact with the assistant principal at Sebastian Elementary School and also interact with the principal at Highland Turner Elementary School. Based on these interactions, it is my understanding that my experience is representative and that my assistant principal and the principal at Highland Turner also spends a substantial portion of their days addressing social media related concerns and that the amount of time they have had to spend on social media related concerns has increased substantially over the last several years.

17. The assistant principal for Sebastian Elementary has reported to me that in or around 2018, approximately 10% of his time with students was spent on social media related concerns, that by 2020 number had risen to around 15%, and that now in 2025 he spends anywhere between 20 – 25% of his work time addressing social media issues. The principal for Highland

Turner Elementary School has only been there for the past few years. He has reported to me that in 2025 he spends 10% of his work time addressing social media issues.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 9, 2025.

/s/Jeremy R. Hall

Jeremy R. Hall